

REMARKS/ARGUMENTS

Claims 15, 17, 18-19, 21-25, 27-30, 32, 35 and 39-47 remain in this application. Claims 1-14, 16, 20, 26, 31, 33-34, 36-38 have been cancelled. Claims 39-47 are new.

The Applicant first discusses the expression Voice/Video over Internet Protocol (VoIP).

VoIP is an umbrella term for a multitude of communication protocols. VoIP can be as simple as exchanging audio and/or video data in real-time, i.e. minimal buffering of data with substantially no latency, between two known devices across IP-based networks, or as complex as resolving the address of an individual and establishing a call between a device and the individual using call signalling.

There are generally two aspects to a VoIP call in the present application: call control and media control. The call control (also call processing or call signalling), in a simple form, involves call setup and call termination between two endpoints. The media control involves the exchange of audio and/or video data between these two endpoints.

Generally speaking, it is not a requirement that the call control element be incorporated within the endpoints of a VoIP call. For example, a server can perform call signalling for a first device in order to establish a VoIP call with a second device. In the call signalling the second device can be made aware of the address of the first device in order to communicate media directly with the first device without involving the server.

Call signalling, in one form, involves ringing a remote device and waiting for a person to accept the call by "going off hook." In another form, call signalling involves resolving the address of a person, ringing a remote device representative of that address, and waiting for the person to accept the call by "going off hook."

The Applicant now discusses in brief one aspect of the present invention.

The premise alarm system of the present invention provides the novel use of establishing a VoIP call between a system control module of the premise alarm system, at a premise, and a remote device upon detection of an alarm event. The system control module establishes the VoIP call by using VoIP call signalling. Once the call is established, media, i.e. audio and/or video data can be delivered to the remote device. The media provides both a notification of the alarm event, and audio and/or video data representative of the alarm event. This eliminates the requirement of a security system server and a central monitoring service.

The remote device can be one that rings, and therefore the premise alarm system of the present application requires a means for call signalling. This is unlike premise alarm systems that communicate with servers or central monitoring services, which are preconfigured to automatically accept communication requests from premise alarm systems.

The Applicant now discusses the objections raised by the Examiner.

The Examiner has rejected claims 15-22, 24-25, 28-29, 33 and 36-38 under 35 U.S.C. 102(e) as being anticipated by United States Patent No. 6,658,091 B1, issued December 2, 2003 to Naidoo et al, hereinafter Naidoo. The Examiner indicates that the Naidoo reference discloses the following: "a system control module (security gateway 115... provides VoIP communication, col. 16, lines 42-46; col. 17, lines 25-27; col. 5, lines 17);... the system control module subsequently establishes an audio VoIP call to a remote device (a VoIP call is established via communications interface 340 to provide streaming live audio to a remote monitoring client 133 during an alarm condition; col. 16, lines 43-46; col. 17, lines 24-28)."

The Applicant with respect traverses the Examiner's indication mentioned above, and respectfully

requests reconsideration.

The above references to VoIP cited by the Examiner are substantially with respect to FIG. 4 in Naidoo, except the above reference found in column 5.

The Naidoo reference discloses a lifestyle multimedia security system (100) for a premise that can deliver audio and video information to remote users. The lifestyle multimedia security system (100) comprises a premise alarm system (security gateway (115), sensors (105), audio stations (107) and video cameras (112)), a security system server (131) in a data center (132), and a monitoring client (133) in a central monitoring station (136). There is also a remote client (155) used for lifestyle monitoring.

However, nowhere does Naidoo disclose a system control module of a premise alarm system at a premise that uses VoIP call signalling to establish a VoIP call with a remote device. The security gateway (115) is not disclosed to have this feature.

The features of the security gateway (115) in FIG. 4 of the Naidoo reference are disclosed from column 12, line 41 to column 15, line 45 and are illustrated in FIG. 3. The communications interface (340) of the security gateway (115) assists in the communication of data, as indicated in column 14, line 13:

“Communications interface 340 may serve as the gateway between security gateway 115 and one or more communications networks...”

and in column 14, line 21:

“Regardless of its form, communications interface 340 assists in the communication of data to and from security gateway 115 and security system server 131.”

The security gateway (115) is therefore disclosed by Naidoo to have means for data communication. However, nowhere does Naidoo disclose that the communications interface (340), and more generally the security gateway (115), comprises means for VoIP call processing/signalling/control.

Naidoo discloses that two-way audio communications are initiated between a remote user (152) and the premises (100) through audio module 330, and as indicated in column 14, line 56:

“Advantageously, the two-way audio communication allows the remote user 152 to interact with a person at the premises without the need for the person at the premises to acknowledge communications channels.”

Clearly, VoIP call signalling is not being used in Naidoo. It is then evident that, with respect to the security gateway (115), the references in Naidoo to Voice over IP (VOIP), i.e. column 5, line 17; column 16, lines 42-26; column 17, lines 24-28; refer to the real-time delivery of audio data, i.e. media control, and not to call signalling. The real-time delivery of audio data is distinguished from the streaming delivery of audio data. The streaming delivery of audio involves substantial buffering of the data, and therefore has inherent latency which does not facilitate two-way audio communications. Note that both the real-time delivery of audio and the streaming delivery of audio can be considered live delivery of audio, since both can be occurring at substantially the same time the audio is first generated by its source.

Again, nowhere does Naidoo disclose that the communications interface (340), and more generally the security gateway (115), comprises means for VoIP call processing/signalling/control.

This is in contrast to claim 15 of the present application, which recites

“A Voice/Video over Internet Protocol (VoIP) alarm apparatus for detecting an

intrusion by an intruder into a ...premise and subsequently establishing an audio VoIP call to a remote device..."

and

"a system control module that ...includes a VoIP call processing algorithm..."

Furthermore, Naidoo discloses that an alarm notification is sent to either the security system server (131) or the central monitoring station (136), as indicated in column 16, lines 26-32:

"Alarm receiver 410 receives the alarm notification and associated information from security gateway 115. The alarm event is then logged and recorded by automation system server 420. Alarm events can also be reported by security gateway 115 to alarm receiver 440 via a communications network such as PSTN 145. Alarm receiver 440 posts the alarm condition to automation system server 420."

The alarm notification of Naidoo is not in the form of audio and/or video data, nor is it a VoIP call. In fact, nowhere in the Naidoo reference is it disclosed that upon detection of an alarm event at the premise the system control module notifies a remote device by establishing a VoIP call. Since a communication channel is first established to deliver the alarm notification, there is not a need for VoIP call signalling in the lifestyle multimedia security system of Naidoo.

This is in contrast to claim 15 of the present application which recites:

"the sensor detects the intruder and signals the peripheral device through the first connection, the peripheral device subsequently signals the system control module through the second connection, the system control module subsequently establishes an audio VoIP call through the third connection and through the modem to a remote

device accessible through the Internet connection, the audio from the microphone of the peripheral device is sent to the remote device.”

Claim 15 has been amended to refer to a VoIP call instead of an audio VoIP call, and to generically refer to a premise instead of a residential, commercial or industrial premise.

It is believed that the objection to claim 15 has been overcome, and it is respectfully submitted that claim 15 is allowable.

Claims 19, 21-22, 24 and 28-29 have been amended to incorporate stylistic changes in claim drafting, as well as removing superfluous text.

Claims 17-19, 21-22, 24-25 and 28-29 depend from claim 15, and it is therefore submitted that they are allowable.

Claims 16, 20, 33 and 36-38 have been cancelled from the application.

It is now believed that the rejections under 35 U.S.C. 102(e) have been overcome.

The applicant submits without prejudice that the disclosure of voice over IP in Naidoo is non-enabling at the time of filing, and therefore does not meet the requirements of 35 U.S.C. 112.

With respect to FIG. 4 in Naidoo, the lifestyle multimedia security system (100) is sufficiently complex, involving the security gateway (115), the security system server (131) in the data center (132), the monitoring client (133) in the central monitoring service (136), the PSTN (145), the network (120) and the network (134). The security gateway (115) itself comprises a video module (320), a communications interface (340), an audio module (330), an alarm control panel (310). The security system server (131) itself comprises an automation system server (420), an alarm receiver

(410), media handler (415), application server (434) and messaging interface (438). The central monitoring service further includes an alarm receiver (440).

The complete substance of Naidoo's disclosure around voice over IP is found in column 16, lines 40-45 and column 17, lines 25-28 where Naidoo discloses that the communication protocols support voice over IP services between the residence and monitoring client (133). Additionally, a shopping list of protocols is provided in the paragraph at column 7, line 60, which substantially deals with video processing, and where H.323 is mentioned as one of the protocols, however this paragraph is disconnected from the disclosure in Naidoo of voice over IP.

Clearly, the disclosure of voice over IP in the specification of Naidoo is exceptionally short and provides substantially no guidance to one skilled in the art on how to carry out the invention using voice over IP in the complex lifestyle multimedia security system (100) without an undue amount of experimentation.

Again, it is respectfully submitted that claim 15 is allowable.

The Examiner has rejected claims 23, 26-27, 30, 31, 32, 34, 35 under 35 U.S.C. 103(a).

Claims 26, 31 and 34 have been cancelled from the application.

Claims 23, 27, 32 and 35 have been amended to incorporated stylistic changes in claim drafting, as well as removing superfluous text.

Claims 23, 27, 30, 32 and 35 depend from claim 15, and it is therefore submitted that they are allowable.

It is now believed that the rejections under 35 U.S.C. 103(a) have been overcome.

The Applicant has added independent claim 39 which recites a premise alarm apparatus comprising a control means for responding to an alarm event, the control means has VoIP call signalling means for establishing and controlling a VoIP call to a remote device. According to the discussion presented above regarding the novel use of VoIP call signalling in the premise alarm apparatus of the present application, this claim is patentably distinguishable over the cited references, and it is submitted that it is therefore allowable.

Claim 40 depends from claim 39 and further recites a media device, i.e. a peripheral device, which provides the media, i.e. audio and/or video data, to the control means.

Claim 41 depends from claim 39 and further recites means for receiving presence information of a person. The presence information provides current information to the premise alarm apparatus as to how the person to be notified during the alarm event can be notified at the current point in time, and which device the person can be notified on. Nowhere in the Naidoo reference is there disclosed the novel concept of presence information. Neither is there disclosed in Naidoo a means for receiving presence information of a person.

The lifestyle multimedia security system (100) of Naidoo is a traditional security system involving a static security system server and a static central monitoring service, which does not include the problem of personal mobility of those who are notified during alarm events. The security service personnel of Naidoo can always be contacted at the same location and on the same device.

This is in contrast to the premise alarm system of the present invention, where the person to be notified can be reached on a multitude of different devices at any point in time.

It is submitted that claims 40 and 41 are patentably distinguishable over the cited references and are therefore allowable.

Claim 42 is similar to cancelled claim 36, and recites a method of responding to an alarm event in a premise alarm system at a premise that includes the novel step of establishing a VoIP call with a remote device using VoIP call signalling. According to the discussion presented above regarding the Examiner's rejection of claim 36, it is respectfully submitted that claim 42 is allowable.

Claim 43 depends from claim 42 and further recites the step of receiving presence information of a person. It is submitted that claim 43 is allowable.

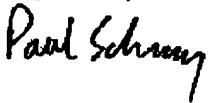
Claims 44 and 45 are similar to claims 42 and 43 and recite a computer program on a computer readable medium for carrying out the steps of the method claims 43 and 43. It is submitted that claims 44 and 45 are allowable.

Claim 46 is similar to claim 39 and recites a combination VoIP gateway and a premise alarm apparatus. It is submitted that claim 46 is allowable.

Claim 47 recites a premise alarm apparatus that receives presence information of a person to be notified of an alarm event. It is submitted that claim 47 is allowable.

It is now believed that all the objections have been overcome and the application is now in order for allowance.

Respectfully submitted,



Paul Schranz
Box G-30 RR1
Bowen Island, British Columbia
Canada, V0N 1G0
Tel: 604-649-3924
Fax: 604-677-6078

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Paul Schranz

Paul Schreyer

Signature

September 12, 2005

Date _____